

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

YELENA RUDERMAN,

Plaintiff,

v.

LAW OFFICE OF YURIY PRAKHIN, P.C., and
YURIY PRAKHIN, ESQ., in both his individual
and professional capacities,

Defendants.

Civil Action No.: 19-cv-02987-RJD-RLM

JOINT PRETRIAL ORDER

Plaintiff Yelena Ruderman (“Plaintiff”) and Defendants Law Office of Yuriy Prakhin, P.C. (the “Firm”) and Yuriy Prakhin, Esq. (“Prakhin”) (together, “Defendants”), hereinafter referenced collectively as the “Parties” and each individually as a “Party,” hereby submit the following joint pretrial order (“JPTO”) in accordance with Section IV(A) of the Court’s Individual Motion Practices and the Court’s January 25, 2022, March 31, 2022, May 2, 2022, and May 13, 2022 Orders. *See* ECF Nos. 107-109, 111.

I. The full caption of the action.

Yelena Ruderman v. Law Offices of Yuriy Prakhin, P.C. and Yuriy Prakhin, in both his individual and professional capacities, No. 1:19-cv-02987(RJD)(RLM) (E.D.N.Y. 2019).

II. The names, addresses (including firm names), and telephone and fax numbers of trial counsel.

Plaintiff is represented by:

Innessa M. Huot
Alex J. Hartzband
Camilo M. Burr
FARUQI & FARUQI, LLP
685 Third Avenue, 26th Floor
New York, New York 10017
Tel: 212-983-9330
Fax: 212-983-9331
ihuot@faruqilaw.com
ahartzband@faruqilaw.com
cburr@faruqilaw.com

Defendants are represented by:

Mary Ellen Donnelly
Louis DiLorenzo
Nicole E. Price
BOND SCHOENECK & KING, PLLC
600 Third Avenue, 22nd Floor
New York, New York 10016
Tel: 646-253-2300
Fax: 646-253-2301
mdonnelly@bsk.com
dilorel@bsk.com
nprice@bsk.com

III. A brief statement by plaintiff as to the basis for subject matter jurisdiction, and a brief statement by each other party as to the presence or absence of subject matter jurisdiction.

A. Plaintiff's Statement

This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1333, as this action involves federal questions regarding the deprivation of Plaintiff's civil rights under the Americans with Disabilities Act, as amended, 42 U.S.C. §§ 12101, *et seq.* (the "ADA"). This Court has supplemental jurisdiction over Plaintiff's claims under the New York State Human

Rights Law, N.Y. Exec. Law §§ 290, *et seq.* (“NYSHRL”) and New York City Human Rights Law, N.Y.C. Admin. Code §§ 8-101, *et seq.* (“NYCHRL”) pursuant to 28 U.S.C. § 1367, as Plaintiff’s NYSHRL and NYCHRL claims are so related to her ADA claim that they form part of the same case or controversy.

B. Defendants’ Statement

Defendants do not dispute the presence of subject matter jurisdiction with respect to Plaintiff’s claims asserted under the ADA, and supplemental jurisdiction over claims asserted pursuant to NYSHRL and NYCHRL.

IV. A brief summary by each party of the claims and defenses that party has asserted which remain to be tried, without recital of evidentiary matter but including citations to all statutes relied upon. Such summaries shall also identify all claims and defenses previously asserted which are not to be tried.

A. Plaintiff’s Summary

Plaintiff’s claims under the ADA, 42 U.S.C. § 12112(b)(4), NYSHRL, N.Y. Exec. Law § 296(1)(a), and NYCHRL, N.Y.C. Admin Code §§ 8-107(1)(a), (20) for discrimination on the basis of her disabilities, including Leber’s Hereditary Optic Neuropathy (“LHON”), which has caused the loss of her vision. Plaintiff disputes each of Defendants’ stated defenses, none of which has merit.

B. Defendants’ Summary

1. Plaintiff’s claims of disability discrimination under Americans with Disabilities Act (“ADA”), 42 U.S.C. §§ 12101, *et seq.*, New York State Human Rights Law (“NYSHRL”), N.Y. Exec. Law §§ 290, *et seq.*, and New York City Human Rights Law (“NYCHRL”), N.Y.C. Admin. Code §§ 8-101, *et seq.* are without merit. Plaintiff has not and cannot demonstrate with sufficient evidence that she is disabled under the law. At no time during her employment did Plaintiff provide Defendants with sufficient notice of her disability. Plaintiff failed to provide Defendants with any medical documentation regarding her condition, as required by law and by the Firm’s Employee Handbook. Plaintiff specifically advised Defendants that she was not disabled. Assuming, *arguendo*, that Plaintiff is disabled under the law, she is not otherwise qualified since she was unable to perform the essential functions of her position as an Associate at the Firm, with or without reasonable accommodation. Additionally, no inference of discrimination arises from Defendants’ termination of Plaintiff’s employment.
2. Plaintiff’s claims of disability discrimination also fail because all actions taken by Defendants regarding Plaintiff’s employment were for legitimate, non-

discriminatory reasons unrelated to Plaintiff's disability and/or other protected classifications. Such reasons include, but are not limited to, unsatisfactory job performance and complaints about Plaintiff from dissatisfied clients.

3. Plaintiff's claims of disability discrimination further fail because Plaintiff cannot establish that Defendants' legitimate, non-discriminatory reasons for terminating Plaintiff's employment were pretextual as the evidence demonstrates that Plaintiff failed to perform the essential functions of her position, with or without accommodation.
4. Plaintiff's claims of failure to accommodate under the ADA, NYSHRL, and NYCHRL are similarly without merit since Defendants provided Plaintiff with reasonable accommodations during her employment. Further, Plaintiff did not submit any requests for any accommodation in writing as required by the Employee Handbook. Assuming, arguendo, that Plaintiff requested accommodations verbally as she alleges, her requested accommodations were unreasonable, not effective, and/or would have imposed an undue hardship on Defendants. Plaintiff's claims also fail because Plaintiff refused reasonable accommodation(s) offered by Defendants, such as a temporary leave of absence.
5. Plaintiff is estopped and barred by her own conduct from requesting the relief set forth in the Complaint because Plaintiff failed to provide Defendants with adequate information about her disability, denied that she was disabled, failed to provide Defendants with adequate information about effective accommodations, and failed to request reimbursement and provide receipts for accommodations she purchased. Plaintiff also failed to take advantage of reasonable accommodation(s) offered by Defendants, including a leave of absence.
6. Plaintiff's continued employment with Defendants would cause a significant risk of substantial harm to the health and/or safety of Plaintiff and others, which could not be eliminated or reduced by a reasonable accommodation.
7. Plaintiff is also not entitled to recover damages. Without conceding that Plaintiff has suffered any damages as a result of any alleged wrongdoing by Defendants, Plaintiff has failed to mitigate or minimize her alleged damages. Moreover, Plaintiff cannot establish that she is entitled to punitive damages. Defendants acted reasonably and in good faith towards Plaintiff regarding all aspects of her employment and termination.

Defenses Previously Asserted by Defendants Which are Not to be Tried:

1. Plaintiff's claims, in whole or in part, are barred by the applicable statute or statutes of limitations.
2. Plaintiff's claims, in whole or in part, are barred by the statute of limitations, laches, res judicata, collateral estoppel, settlement and release, or accord and satisfaction.
3. Plaintiff's claims are barred by her failure to invoke or exhaust available complaint, investigation, dispute resolution, arbitration, appeal, protest, or administrative procedures, avenues, remedies and/or prerequisites to suit.
4. Plaintiff's claims are barred, in whole or in part, to the extent that they exceed the scope of or are inconsistent with the Charge of Discrimination Plaintiff filed with the EEOC.

V. A statement by each party as to whether the case is to be tried with a jury, and the number of trial days needed.

The Parties agree that this case is to be tried with a jury and anticipate that the length of the trial will be approximately five to seven days.

VI. A statement as to whether all parties have consented to trial of the case by a Magistrate Judge (without identifying which parties have or have not so consented).

The Parties do not consent to trial of this case by a Magistrate Judge.

VII. Any stipulations or statements of fact or law which have been agreed upon by all parties.

- (1) The Firm is a plaintiff-side personal injury and medical malpractice law firm located at 1883 86th Street, 2nd Floor, Brooklyn, New York 11214.
- (2) Prakhin is the founder and President of the Firm.
- (3) Defendants employ at least 15 people at the Firm, and employed at least as many people throughout Plaintiff's employment at the Firm.
- (4) Irene Raskin ("Raskin") commenced employment with the Firm in 2015 as the Office Manager.
- (5) SAGA is a case management database system that was used by the Firm in 2018.

- (6) In September 2012, Plaintiff was hired by the Firm as a paralegal.
- (7) In November 2012, after being admitted to the New York State Bar, Plaintiff began working for the Firm as an Associate.
- (8) In February 2017, Plaintiff voluntarily resigned from her employment with the Firm to pursue an Associate position at Mallilo & Grossman, another plaintiff-side personal injury law firm.
- (9) At the time of her departure from the Firm in February 2017, Plaintiff was paid a salary of \$75,000, and did not have any paralegals assigned to work exclusively with her.
- (10) In 2018, Prakhin offered Plaintiff an Associate position at the Firm with an increased salary of \$100,000.
- (11) Plaintiff commenced her second period of employment with the Firm on June 18, 2018.
- (12) Irene Gabo (“Gabo”) was the Firm’s Managing Attorney during Plaintiff’s second period of employment until October 1, 2018.
- (13) Gabo resigned from the Firm to commence her own law practice effective October 1, 2018.
- (14) Patricia Belous (“Belous”) was hired as a paralegal by the Firm in August 2018.
- (15) Belous was assigned to work with Plaintiff.
- (16) Erica Larssen (“Larssen”) was hired as a paralegal by the Firm in September 2018.
- (17) Prakhin terminated Plaintiff’s employment with the Firm on December 14, 2018.

VIII. A statement by each party as to the witnesses whose testimony is to be offered in its case-in-chief, with a brief narrative statement of the expected testimony.

A. Plaintiff’s Statement

Plaintiff intends to offer the testimony of the following witnesses in her case-in-chief:

- (1) Plaintiff: Plaintiff will testify about, *inter alia*, her hiring by and employment with Defendants, her job responsibilities, compensation, and performance, the Firm’s policies and culture, her disability, her disclosures concerning the same, reasonable accommodations provided or denied to her, the termination of her employment, and her damages.

- (2) Prakhin: Prakhin is expected to testify about, *inter alia*, Plaintiff's hiring by and employment with Defendants, Plaintiff's job responsibilities, compensation, and performance, the Firm's policies and culture, Plaintiff's disability, Plaintiff's disclosures concerning the same, reasonable accommodations provided or denied to Plaintiff, the termination of Plaintiff's employment, and Defendants' finances.
- (3) Gabo: Gabo is expected to testify about, *inter alia*, Plaintiff's hiring by and employment with Defendants, Plaintiff's job responsibilities, compensation, and performance, the Firm's policies and culture, Plaintiff's disability, Plaintiff's disclosures concerning the same, reasonable accommodations provided or denied to Plaintiff, and the termination of Plaintiff's employment.
- (4) Raskin: Raskin is expected to testify about, *inter alia*, Plaintiff's hiring by and employment with Defendants, Plaintiff's job responsibilities, compensation, and performance, the Firm's policies and culture, Plaintiff's disability, Plaintiff's disclosures concerning the same, reasonable accommodations provided or denied to Plaintiff, the termination of Plaintiff's employment, and Defendants' finances.
- (5) Larssen: Larssen is expected to testify about, *inter alia*, Plaintiff's employment with Defendants, Plaintiff's job responsibilities and performance, the Firm's policies and culture, Plaintiff's disability, Plaintiff's disclosures concerning the same, and reasonable accommodations provided or denied to Plaintiff.
- (6) Belous: Belous is expected to testify about, *inter alia*, Plaintiff's employment with Defendants, Plaintiff's job responsibilities and performance, the Firm's policies and culture, Plaintiff's disability, Plaintiff's disclosures concerning the same, and reasonable accommodations provided or denied to Plaintiff.
- (7) Alexander Pusachev: Pusachev is expected to testify about, *inter alia*, Defendants' IT practices and procedures, the Firm's policies and culture, Plaintiff's disability, Plaintiff's disclosures concerning the same, reasonable accommodations provided or denied to Plaintiff, and Defendants' retention, archiving, storage, and/or destruction of documents.
- (8) Any witness(es) Defendants list in this JPTO or any amendment thereto; and
- (9) Any witness(es) Defendants otherwise call to testify at trial.

Plaintiff believes that each of these witnesses will testify in person. Plaintiff reserves the right to call any witness listed by Defendants. Plaintiff reserves the right to call unlisted witnesses for purposes of impeachment, in rebuttal, or for the authentication and introduction of disputed documents. Plaintiff also reserves the right to supplement and/or modify this statement consistent with the Federal Rules of Civil Procedure, Local Civil Rules for the Eastern District of New York, and/or the Individual Motion Practices of the Honorable Raymond J. Dearie, or as may otherwise be necessary or appropriate between now and the date of trial.

Plaintiff expressly objects to the introduction of testimony from Natalia Generalova, Azfar Khan, Vitaliy Lyutyk, Laura Shavarts, Marina Zhernakova, and the interpreter from Trusteforte Language Services by Defendants at trial.

B. Defendants' Statement

Defendants provide the following list of witnesses to be offered in their case-in-chief subject to the following reservation of rights: (i) Defendants reserve the right not to offer the testimony of any designated witness; and (ii) Defendants reserve the right to offer live or deposition testimony, where authorized by FRCP 32, of any other Party or any witness designated by any other party.

Defendants intend to offer the testimony of the following witnesses in their case-in-chief:

- (1) Yuriy Prakhin: Mr. Prakhin is a party witness and will testify in person regarding, *inter alia*, the Firm's business, the Firm's policies, the job duties of associates, paralegals, and the managing attorney, compensation, Plaintiff's employment and job performance, the termination of Plaintiff's employment, the termination of attorneys' employment, and claims and defenses to the Complaint.
- (2) Gil Zohar: Mr. Zohar is a non-party witness and will testify in person regarding, *inter alia*, the Firm's business, job duties of associates, paralegals, and the managing attorney, compensation and work performance of the Firm's employees, and claims and defenses to the Complaint.
- (3) Irene Raskin: Ms. Raskin is a non-party witness and will testify in person regarding, *inter alia*, the Firm's business, the Firm's policies, leaves of absence, scheduling depositions, Plaintiff's employment and job performance, and claims and defenses to the Complaint.
- (4) Erica Larssen: Ms. Larssen is a non-party witness and will testify in person regarding, *inter alia*, Plaintiff's employment and job performance, and claims and defenses to the Complaint.
- (5) Patricia Belous: Ms. Belous is a non-party witness and will testify in person regarding, *inter alia*, Plaintiff's employment and job performance, and claims and defenses to the Complaint.
- (6) Natalia Generalova: Ms. Generalova is a non-party witness and will testify in person regarding, *inter alia*, her experience as a client of the Firm and Plaintiff's job performance.
- (7) Azfar Khan: Mr. Khan is a non-party witness and will testify in person regarding, *inter alia*, his experience as a client of the Firm and Plaintiff's job performance.

- (8) Vitaliy Lyutuk: Mr. Lyutuk is a non-party witness and will testify in person regarding, *inter alia*, his experience as a client of the Firm and Plaintiff's job performance.
- (9) Laura Shvarts: Ms. Shvarts is a non-party witness and will testify in person regarding, *inter alia*, her experience as a client of the Firm and Plaintiff's job performance.
- (10) Marina Zhernyakova: Ms. Zhernyakova is a non-party witness and will testify in person regarding, *inter alia*, her experience as a client of the Firm and Plaintiff's job performance.
- (11) Alexander Pusachev: Mr. Pusachev is a non-party witness and will testify in person regarding, *inter alia*, his IT consulting work for the Firm, and the extraction of Instant Messages from the Firm's computer system.
- (12) Interpreter from Trusteforte Language Services: This individual is a Russian interpreter and non-party witness and will testify in person to provide translations of recorded conversations in Russian.
- (13) Dr. Anna Shostak: Dr. Shostak is a non-party witness and will testify in person regarding Plaintiff's mental health history and mental health conditions prior to the termination of her employment from the Firm in December 2018.
- (14) Any witness(es) Plaintiff lists in this JPTO or any amendment thereto; and
- (15) Any witness(es) Plaintiff calls to testify at trial.

As this Joint Pre-Trial Order is final except for rebuttal evidence, Defendants object to Plaintiff's statement reserving the right to supplement and/or modify this Joint Pre-Trial Order, call unlisted witnesses or introduce disputed documents except to the extent permitted under the Federal Rule of Civil Procedure, Federal Rules of Evidence, the Local Rules of the Eastern District of New York and/or the Judge's individual rules. However, if Plaintiff is permitted to reserve and/or is granted such rights, Defendants reserve, do not waive, and request the same right to call unlisted witnesses for purposes of impeachment, in rebuttal, or for the authentication and introduction of disputed documents, as well as to supplement and/or modify this statement consistent with the Federal Rules of Civil Procedure, Local Civil Rules for the Eastern District of New York, and/or the Individual Motion Practices of the Honorable Raymond J. Dearie, or as may otherwise be necessary or appropriate between now and the date of trial.

Defendants object to Plaintiff's listed witnesses to the extent that they lack personal knowledge regarding the subjects Plaintiff has listed for their expected testimony. Defendants also reserve their rights to further object to Plaintiff's listed witnesses, Plaintiff's questioning of such witnesses, and any testimony by such witnesses.

IX. A designation by each party of deposition testimony to be offered in its case-in-chief, with any cross-designations and objections by any other party.

A. Plaintiff's Position

Plaintiff does not anticipate that any witnesses will be unavailable to testify within the meaning of Federal Rules of Civil Procedure 32 and/or 45, and as such, does not anticipate designating deposition testimony to be offered in her case-in-chief. Plaintiff reserves the right to designate and introduce the deposition testimony of any witness within a reasonable period of time after it is determined that such witness is unavailable.

In addition to the depositions of the Plaintiff and Prakhin, five non-parties were deposed in this action: Gabo, Larssen, Raskin, Belous, and Pusachev. Larssen, Raskin, and Belous are employees of Defendants. Pusachev is a contractor who works for Defendants regularly, and Gabo is the Firm's former Managing Attorney who still maintains a relationship with the Firm. Defendants produced Larssen, Raskin, Belous, and Pusachev for their depositions. As such, Plaintiff expects that Defendants will produce Larssen, Raskin, Belous, and Pusachev for testimony at trial, and expects that Gabo will appear willingly in response to a trial subpoena. In the event Defendants refuse to produce Larseen, Raskin, Belous, and/or Pusachev, and Gabo is unwilling to appear voluntarily, for trial and the witnesses are otherwise unavailable to testify within the meaning of Federal Rules of Civil Procedure 32 and/or 45, Plaintiff reserves the right to designate and introduce Gabo's Larssen's, Raskin's, Belous's, and/or Pusachev's deposition testimony at trial.

Because Plaintiff will be produced at trial and Defendants have not notified Plaintiff that Prakhin, Raskin, Belous, and/or Larssen will not be produced or are otherwise unavailable to testify within the meaning of Federal Rules of Civil Procedure 32 and/or 45, Plaintiff objects to Defendants' designation of deposition testimony for Plaintiff, Prakhin, Raskin, Belous, and Larssen.

B. Defendants' Position

At this time, Defendants intend to present testimony through live witnesses. Defendants may introduce the following deposition excerpts:

Defendants' Designation	Cross-Designation(s) by Plaintiff	Objection(s) by Plaintiff
Plaintiff - 25:2-10	25:12-26:12; 111:7-114:15	Foundation; Fed. R. Evid. 403
Plaintiff - 27:10-28:13	19:7-21:16; 29:6-14	Foundation; Fed. R. Evid. 403
Plaintiff - 30:22-32:10	19:7-21:16; 29:6-14	Foundation; Fed. R. Evid. 403
Plaintiff - 33:6-38:6	19:7-21:16; 29:6-14; 38:7-15	Foundation; Fed. R. Evid. 403
Plaintiff - 41:10-14	N/A	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 46:20-47:15	N/A	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper

		Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
Plaintiff - 48:23-50:22	47:20-48:22; 50:23-70:24; 208:2-8; 209:25-210:9; 226:7-227:20	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 53:7-8	47:20-48:22; 50:23-70:24	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 53:25-21	47:20-48:22; 50:23-70:24	Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 59:8-25	47:20-48:22; 50:23-70:24	Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 60:2-16	47:20-48:22; 50:23-70:24	Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 61:2-62:3	47:20-48:22; 50:23-70:24	Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 68:19-10	47:20-48:22; 50:23-70:24	Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 87:21-88:7	25:12-26:12; 111:7-114:15	Foundation; Fed. R. Evid. 403
Plaintiff - 90:22-91:9	91:10-13	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 92:18-93:24	94:14-95:3	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 94:14-95:3	N/A	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 96:6-97:19	109:10-18; 145:14-146:4; 201:20-202:9; 217:19-218:10	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 98:8-21	176:8-178:5	Relevance; Hearsay; Foundation; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 99:9-13	176:8-178:5	
Plaintiff - 102:12-23	100:20-102:3; 102:24-103:4; 103:23-104:17; 119:9-21; 153:21-154:5; 157:2-11; 160:7-22; 179:6-183:22; 187:25-188:10	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 104:5-17	100:20-102:3; 102:24-103:4; 103:23-104:17; 119:9-21; 153:21-154:5; 157:2-11; 160:7-22; 179:6-183:22; 187:25-188:10	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 111:4-114:15	25:12-26:12; 111:7-114:15	Foundation; Fed. R. Evid. 403
Plaintiff - 120:14-121:11	109:10-18; 145:14-146:4; 201:20-202:9; 217:19-218:10	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper Opinions and Conclusions; Fed. R. Evid. 403

Plaintiff - 122:23-128:5	N/A	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
Plaintiff - 128:16-138:20	N/A	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
Plaintiff - 143:7-17	150:20-151:19	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Fed. R. Evid. 403
Plaintiff - 144:17-145:5	100:20-102:3; 102:24-103:4; 103:23-104:17; 119:9-21; 153:21-154:5; 157:2-11; 160:7-22; 179:6-183:22; 187:25-188:10	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Fed. R. Evid. 403
Plaintiff - 145:22-146:4	100:20-102:3; 102:24-103:4; 103:23-104:17; 119:9-21; 153:21-154:5; 157:2-11; 160:7-22; 179:6-183:22; 187:25-188:10	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 147:17-149:10	146:23-147:14; 149:16-150:15; 153:15-156:16; 158:22-159:5; 206:21-207:5	Relevance; Hearsay; Foundation; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 151:22-152:18	146:23-147:14; 149:16-150:15; 153:15-156:16; 158:22-159:5; 206:21-207:5	Relevance; Hearsay; Foundation; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 153:9-19	146:23-147:14; 149:16-150:15; 153:15-156:16; 158:22-159:5; 206:21-207:5	Relevance; Hearsay; Foundation; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 154:6-155:25	146:23-147:14; 149:16-150:15; 153:15-156:16; 158:22-159:5; 206:21-207:5	Relevance; Hearsay; Foundation; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 157:25-159:5	146:23-147:14; 149:16-150:15; 153:15-156:16; 158:22-159:5; 206:21-207:5	Relevance; Hearsay; Foundation; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 161:5-20	109:10-18; 145:14-146:4; 201:20-202:9; 217:19-218:10	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 171:8-22	25:12-26:12; 111:7-114:15	Foundation; Hearsay; Fed. R. Evid. 403

Plaintiff - 174:2-18	100:20-102:3; 102:24-103:4; 103:23-104:17; 119:9-21; 153:21- 154:5; 157:2-11; 160:7-22; 179:6- 183:22; 187:25-188:10	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 182:19-183:8	100:20-102:3; 102:24-103:4; 103:23-104:17; 119:9-21; 153:21- 154:5; 157:2-11; 160:7-22; 179:6- 183:22; 187:25-188:10	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 185:4-187:12	100:20-102:3; 102:24-103:4; 103:23-104:17; 119:9-21; 153:21- 154:5; 157:2-11; 160:7-22; 179:6- 183:22; 187:25-188:10	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 189:24-190:12	25:12-26:12; 111:7-114:15	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 194:11-195:6	25:12-26:12; 109:10-18; 111:7- 114:15; 145:14-146:4; 201:20- 202:9; 217:19-218:10	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 201:5-25	109:10-18; 145:14-146:4; 201:20- 202:9; 205:14-206:10; 212:14-24; 217:19-218:10; 238:20-239:10	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 202:10-12	25:12-26:12; 109:10-18; 111:7- 114:15; 145:14-146:4; 201:20- 202:9; 205:14-206:10; 212:14-24; 217:19-218:10; 238:20-239:10	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 205:14-206:2	109:10-18; 145:14-146:4; 201:20- 202:9; 205:14-206:10; 212:14-24; 217:19-218:10; 238:20-239:10	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 206:18-207:18	25:12-26:12; 109:10-18; 111:7- 114:15; 145:14-146:4; 201:20- 202:9; 205:14-206:10; 212:14-24; 217:19-218:10; 238:20-239:10	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 208:9-209:20	25:12-26:12; 109:10-18; 111:7- 114:15; 145:14-146:4; 201:20- 202:9; 205:14-206:10; 212:14-24; 217:19-218:10; 238:20-239:10	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 212:11-20	109:10-18; 145:14-146:4; 201:20- 202:9; 205:14-206:10; 212:14-24; 217:19-218:10; 238:20-239:10	Relevance; Hearsay; Foundation; Fed. R. Evid. 403

Plaintiff - 214:9-11	214:12-19	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 215:20-216:12	109:10-18; 145:14-146:4; 201:20-202:9; 205:14-206:10; 212:14-24; 217:19-218:10; 238:20-239:10	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 216:17-217:21	109:10-18; 145:14-146:4; 201:20-202:9; 205:14-206:10; 212:14-24; 217:19-218:10; 238:20-239:10	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 219:21-220:2	109:10-18; 145:14-146:4; 201:20-202:9; 217:19-218:10	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Fed. R. Evid. 403
Plaintiff - 220:24-221:5	25:12-26:12; 111:7-114:15; 224:23-225:13	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Fed. R. Evid. 403
Plaintiff - 222:14-224:20	25:12-26:12; 111:7-114:15; 224:23-225:13	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Fed. R. Evid. 403
Plaintiff - 225:14-226:12	25:12-26:12; 111:7-114:15; 224:23-225:13	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Fed. R. Evid. 403
Plaintiff - 228:4-13	109:10-18; 145:14-146:4; 201:20-202:9; 217:19-218:10	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Fed. R. Evid. 403
Plaintiff - 229:4-230:18	25:12-26:12; 109:10-18; 111:7-114:15; 109:10-18; 145:14-146:4; 201:20-202:9; 205:14-206:10; 214:12-19; 217:19-218:10; 238:20-239:10; 253:13-254:12	Relevance; Foundation; Fed. R. Evid. 403
Plaintiff - 236:12-237:11	146:23-147:14; 149:16-150:15; 153:15-156:16; 158:22-159:5; 206:21-207:5	Relevance; Hearsay; Foundation; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 238:7-11	146:23-147:14; 149:16-150:15; 153:15-156:16; 158:22-159:5; 206:21-207:5	Relevance; Hearsay; Foundation; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 238:20-240:24	109:10-18; 145:14-146:4; 201:20-202:9; 205:14-206:10; 212:14-24; 217:19-218:10; 238:20-239:10	Relevance; Hearsay; Foundation; Improper Opinions and Conclusions; Fed. R. Evid. 403
Plaintiff - 243:11-245:18	19:7-21:16; 29:6-14; 38:7-15	Relevance; Foundation; Fed. R. Evid. 403

Plaintiff - 249:19-251:5	25:12-26:12; 109:10-18; 111:7-114:15; 145:14-146:4; 201:20-202:9; 205:14-206:10; 212:14-24; 217:19-218:10; 238:20-239:10	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 253:3-254:23	25:12-26:12; 109:10-18; 111:7-114:15; 145:14-146:4; 201:20-202:9; 205:14-206:10; 212:14-24; 217:19-218:10; 238:20-239:10	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Plaintiff - 257:9-14	25:2-26:12; 72:20-73:3; 109:10-18; 111:7-114:15; 145:14-146:4; 201:20-202:9; 205:14-207:5; 212:14-24; 217:19-218:10; 238:20-239:10; 251:14-252:18	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Prakhin - 136:7-137:16	150:25-153:19; 155:8-156:21; 250:13-16; 260:11-263:7	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Prakhin - 195:2-197:16	197:17-198:11	Hearsay; Foundation; Fed. R. Evid. 403
Prakhin - 207:21-209:23	189:9-191:6; 198:12-21; 209:13-212:17; 222:4-224:18	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
Prakhin - 234:7-25	235:6-20; 281:23-282:4; 305:13-24; 316:21-317:10	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Fed. R. Evid. 403
Prakhin - 273:8-274:25	235:6-20; 276:13-19; 281:23-282:4; 305:13-24; 316:21-317:10	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Fed. R. Evid. 403
Prakhin - 276:25-277:21	189:9-191:6; 198:12-21; 209:13-212:17; 222:4-224:18; 336:6-337:8	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
Prakhin - 280:23-281:17	235:6-20; 281:23-282:4; 305:13-24; 316:21-317:10; 276:13-19	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
Prakhin - 285:13-286:16	139:15-144:7; 189:9-191:6; 198:12-21; 209:13-212:17; 222:4-224:18; 277:16-21	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Fed. R. Evid. 403
Prakhin 30(b)(6) - 125:13-126:23	128:21-129:6; Prakhin Dep. at 298:10-302:18	Relevance; Hearsay; Foundation; Fed. R. Evid. 403

Prakhin 30(b)(6) - 129:19-130:10	128:21-129:6	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Raskin - 64:2-14	63:7-70:24; 111:4-112:18; 121:20-127:10; 134:25-137:16; 139:16-140:24	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Raskin - 124:21-125:18	63:7-70:24; 111:4-112:18; 121:20-127:10; 128:2-129:21; 134:25-137:16; 139:16-140:24	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Raskin - 128:14-22	128:23-129:3	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Raskin - 145:22-146:7	146:8-148:7	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Raskin - 157:21-158:10	63:7-70:24	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Belous - 61:10-62:6	24:24-25:7; 62:7-63:25	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Larssen - 76:23-77:9	13:13-33:12; 77:23-87:12; 130:15-132:19	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Larssen - 78:22-79:6	13:13-33:12; 77:23-87:12; 130:15-132:19	Relevance; Hearsay; Foundation; Fed. R. Evid. 403
Larssen - 83:22-85:5	13:13-33:12; 77:23-87:12; 130:15-132:19	Relevance; Hearsay; Foundation; Fed. R. Evid. 403

X. A list by each party of exhibits to be offered into evidence.

A. Plaintiff's Exhibits

Exhibit No.	Bates No.	Description	Objection(s) by Defendants
N/A	N/A	Enlarged versions of the exhibits of any Party.	Fed. Rules Evid. 802-805, 901-902, 1003; Violates best evidence rule; Incorrect representation; Not instructive. The exhibit has not been provided, and Defendants reserve their right to make any and all further objections when presented.

Exhibit No.	Bates No.	Description	Objection(s) by Defendants
N/A	N/A	Enlarged excerpts of the deposition or trial testimony of any witness.	Fed. Rules Evid. 802-805, 901-902, 1003; Violates best evidence rule; Incorrect representation; Not instructive. The exhibit has not been provided, and Defendants reserve their right to make any and all further objections when presented.
N/A	N/A	Electronic highlighting and/or cropping and/or “pop-outs” of the exhibits of any Party.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Violates best evidence rule; Incorrect representation; Not instructive. The exhibit has not been provided, and Defendants reserve their right to make any and all further objections when presented.
N/A	N/A	Electronic highlighting and/or cropping and/or “pop-outs” of the deposition or trial testimony of any witness.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Violates best evidence rule; Incorrect representation; Not instructive. The exhibit has not been provided, and Defendants reserve their right to make any and all further objections when presented.
N/A	N/A	Compilations of information contained within the exhibits of any party, including, but not limited to, lists, charts, graphs, tables, timelines, PowerPoint presentations, slide shows or any other form of presenting such information.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Violates best evidence rule; Incorrect representation; Not instructive. The exhibit has not been provided, and Defendants reserve their right to make any and all further objections when presented.

Exhibit No.	Bates No.	Description	Objection(s) by Defendants
N/A	N/A	Compilations of the deposition or trial testimony of any witness, including, but not limited to, lists, charts, graphs, tables, timelines, PowerPoint presentations, slideshows or any other form of presenting such information.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Violates best evidence rule; Incorrect representation; Not instructive. The exhibit has not been provided, and Defendants reserve their right to make any and all further objections when presented.
1	PLAINTIFF 000015	Medical records dated October 8, 2018.	Fed. Rules Evid. 802-805, 901-902, 1003
2	PLAINTIFF 000016-32	Medical records dated November 5, 2018.	Fed. Rules Evid. 802-805, 901-902, 1003
3	PLAINTIFF 000053	Email dated December 5, 2018.	
4	PLAINTIFF 000057-58	Invoice dated November 9, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Incomplete exhibit.
5	PLAINTIFF 000060-63	Emails dated November 9, 2018.	
6	PLAINTIFF 000107-9	Declaration of Nicholas Serlin.	Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; lack of personal knowledge; speculation; improper opinion and conclusions; improper character evidence
7	PLAINTIFF 000110-14	Declaration of Steven Korytny.	Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; lack of personal knowledge; speculation; improper opinion and conclusions; improper character evidence
8	PLAINTIFF 000315	Email dated August 13, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
9	PLAINTIFF 000348-49	Email dated August 15, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
10	PLAINTIFF 000518-19	Email dated September 5, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
11	PLAINTIFF 00613-51	Medical records dated April 30, 2017, March 22, 2017, March 27, 2017, March 24, 2017, and October 9, 2017.	Relevance; Fed. Rules Evid. 403, 802-805, 901-902, 1003; This is privileged medical information of a non-party and confidential information regarding the Firm's client that has not been redacted or marked confidential.
12	PLAINTIFF 000664-71	Email dated October 15, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003

Exhibit No.	Bates No.	Description	Objection(s) by Defendants
13	PLAINTIFF 001059	Email dated September 20, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
14	PLAINTIFF 001082	Email dated August 1, 2018.	
15	PLAINTIFF 001089	Emails dated August 6, 2018.	
16	PLAINTIFF 001260-97	Invoices.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Incomplete exhibit.
17	PLAINTIFF 001376-93	Transcript of audio recording labeled 370-Inbound-Optimum-646726642-509.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; objection to the accuracy of the translation and transcript
18	PLAINTIFF 001396-1404	Transcript of audio recording labeled 384-Inbound-Optimum 646726642-509.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; objection to the accuracy of the translation and transcript
19	PLAINTIFF 001405-1415	Transcript of audio recording labeled 386-Inbound-Optimum 646726642-509.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; objection to the accuracy of the translation and transcript
20	PLAINTIFF 001428-36	Transcript of audio recording labeled 482-Inbound- Optimum 646726642-509.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; objection to the accuracy of the translation and transcript
21	PLAINTIFF 001466-1467	Transcript of audio recording labeled 485-Inbound- Optimum 646726642-509.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; objection to the accuracy of the translation and transcript
22	PLAINTIFF 001473-74	Transcript of audio recording labeled 261- International-500-502.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; objection to the accuracy of the translation and transcript
23	PLAINTIFF 001475	Transcript of audio recording labeled 324- International-500-502.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; objection to the accuracy of the translation and transcript
24	PLAINTIFF 001476	Transcript of audio recording labeled 334- International-500-502.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; objection to the accuracy of the translation and transcript

Exhibit No.	Bates No.	Description	Objection(s) by Defendants
25	PLAINTIFF 01477	Transcript of audio recording labeled 377-International-500-502.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; objection to the accuracy of the translation and transcript
26	PLAINTIFF 001478	Transcript of audio recording labeled 394-International-500-502.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; objection to the accuracy of the translation and transcript
27	PLAINTIFF 001479	Transcript of audio recording labeled 432-International-500-502.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; objection to the accuracy of the translation and transcript
28	PLAINTIFF 001480	Transcript of audio recording labeled 436-International-500-502.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; objection to the accuracy of the translation and transcript
29	PLAINTIFF 001481	Transcript of audio recording labeled 439-International-500-502.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; objection to the accuracy of the translation and transcript
30	PLAINTIFF 001482	Transcript of audio recording labeled 517-Inbound- Optimum 646726642-500.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; objection to the accuracy of the translation and transcript
31	PLAINTIFF 001538-001539	Plaintiff's résumé.	
32	PLAINTIFF 001644	Invoice dated December 2, 2020.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Incomplete exhibit.
33	PLAINTIFF 001658-64	Text messages dated October 3, 2018 through November 21, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; violates best evidence rule; improper character evidence. This is privileged medical information of a non-party and confidential information regarding the Firm's client that has not been redacted or marked confidential. Description of the exhibit does not accurately reflect the contents of the exhibit.

Exhibit No.	Bates No.	Description	Objection(s) by Defendants
34	D00001-4	Emails dated December 12, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
35	D00017-23	Emails dated November 15, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Duplicative of Plaintiff's Exs. 49 and 50
36	D00104-8	Emails dated September 18, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
37	D00325	Emails dated October 16, 2018.	
38	D00353-54	Emails dated September 20, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
39	D00359-61	Emails dated September 18, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
40	D00494-95	Emails dated July 26, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
41	D00724-26	Emails dated August 13, 2018.	
42	D00761-62	Emails dated December 13, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
43	D00814	Emails dated September 12, 2018.	
44	D00828-29	Email dated July 10, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
45	D00833	Email dated December 19, 2018.	
46	D00855	Email dated November 9, 2018.	
47	D01140-41	Emails dated January 7, 2019.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
48	D01191	Email dated October 20, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
49	D01202-1208	Emails dated November 15, 2018.	
50	D01299-1305	Emails dated November 15, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Duplicative of Plaintiff's Ex. 49
51	D01311-13	Emails dated November 20, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
52	D01322-23	Emails dated February 11, 2019.	
53	D01326	Email dated June 19, 2018.	
54	D01382-91	Email dated October 15, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
55	D01409-10	Email dated August 14, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
56	D01414	Emails dated October 1, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
57	D01415-16	Emails dated October 29, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003

Exhibit No.	Bates No.	Description	Objection(s) by Defendants
58	D01417-01419	Emails dated October 29, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
59	D01440-41	Emails dated November 14, 2018.	
60	D01457-59	Emails dated December 10, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
61	D01460-63	Emails dated December 12, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
62	D01477-78	Emails dated July 31, 2018.	
63	D01496-97	Emails dated August 14, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
64	D01503-4	Emails dated August 22, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
65	D01505	Emails dated August 31, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
66	D01512-13	Emails dated September 20, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
67	D01527-28	Emails dated September 25, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
68	D01542	Emails dated September 27, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
69	D01546-52	Email dated October 7, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
70	D01553	Email dated October 8, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
71	D01566	Email dated November 30, 2018.	
72	D01567	Email dated February 1, 2019.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
73	D01600-1	Emails dated September 26, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
74	D01606-8	Emails dated October 13, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
75	D01628	Email dated December 10, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
76	D01678	Emails dated October 10, 2018.	
77	D01679	Email dated October 15, 2018.	
78	D01690-91	Emails dated March 30, 2020.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
79	D01702-3	Emails dated August 15, 2018.	
80	D01715	Emails dated September 21, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
81	D01720-24	Emails dated September 25, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003

Exhibit No.	Bates No.	Description	Objection(s) by Defendants
82	D01726	Emails dated September 27, 2018	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Duplicate of Plaintiff's Ex. 68 (D01542)
83	D01732	Emails dated October 8, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
84	D01759-65	Emails dated December 28, 2018.	
85	D01770-72	Emails dated February 18, 2019.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
86	D01793	Emails dated September 24, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
87	D01802	Email dated November 17, 2018.	
88	D01815-16	Emails dated December 8, 2018.	
89	D01944-2071	Deposition transcript dated December 3, 2018.	Relevance; Fed. Rules Evid. 403, 802-805, 901-902, 1003; not instructive. Description of the exhibit does not accurately reflect the contents of the exhibit.
90	D03562	Email dated October 4, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
91	D03656-57	Emails dated October 13, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
92	D03718	Emails dated October 13, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
93	D03774-75	Emails dated October 20, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
94	D03812-13	Emails dated October 20, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
95	D03867-8	Emails dated October 29, 2018	
96	D04100	Email dated December 5, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
97	D05009-10	Emails dated July 25, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
98	D05582	Email dated August 2, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Incomplete Exhibit
99	D05679	Email dated August 6, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
100	D05714	Email dated August 6, 2018.	
101	D06441-42	Email dated August 27, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
102	D07364	Emails dated September 10, 2018.	
103	D07450	Email dated September 11, 2018.	
104	D07455-56	Email dated September 11, 2018.	

Exhibit No.	Bates No.	Description	Objection(s) by Defendants
105	D07652-53	Email dated September 17, 2018.	
106	D07683-7752	Deposition transcript dated March 20, 2017.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
107	D07791	Emails dated September 2018, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Duplicate of Plaintiff's Ex. 39 (D00359-61)
108	D07794-98	Emails dated February 15, 2018, February 22, 2018, June 1, 2018, June 5, 2018, June 15, 2018 and September 18, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
109	D07814	Email dated September 18, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
110	D08142	Emails dated December 16, 2016 and September 21, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Duplicate of Plaintiff's Ex. 80 (D01715)
111	D08281-82	Emails dated September 24, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
112	D08338	Email dated September 26, 2018.	
113	D08739-8801	Deposition dated March 30, 2017.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
114	D08945-48	Emails dated July 5, 2018, July 11, 2018, July 16, 2018, and November 3, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
115	D09559-62	Email dated November 14, 2018, November 19, 2018, November 21, 2018 and December 12, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Duplicate of Plaintiff's Ex. 61 (D01460-63)
116	D09622-9623	Emails dated December 8, 2018.	
117	D10061	Email dated September 18, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
118	D10358	Email dated August 6, 2018.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; Duplicate of Plaintiff's Ex. 100 (D05714)
119	D10969	Emails dated October 20, 2018 and November 2, 2018.	
120	D11964	2018 8879-S Form.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
121	D11974	2018 1125-E Form.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
122	D11975	2019 8879-S Form.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
123	D11981	2019 1125-E Form.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
124	D11982	2018 1040 Form.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
125	D11984	2019 1040 Form.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003

Exhibit No.	Bates No.	Description	Objection(s) by Defendants
126	D13052-13118	Plaintiff's payroll records.	Description of the exhibit does not accurately reflect the contents of the exhibit. Relevance re: Plaintiff's payroll from before 2018 (D13058-D131099)
127	D014546	Email dated August 7, 2019.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
128	D014867-68	Email dated January 28, 2021.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
129	D014882	Medical records dated September 19, 2018.	Fed. Rules Evid. 802-805, 901-902, 1003
130	D014913-33	Medical records dated October 5, 2018.	Fed. Rules Evid. 802-805, 901-902, 1003 Description of the exhibit does not accurately reflect the contents of the exhibit.
131	N/A	Defendants' Initial Disclosures.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
132	N/A	Defendants' Responses to Plaintiff's First Set of Interrogatories.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
133	N/A	Defendants' Responses to Plaintiff's Second Set of Interrogatories.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
134	N/A	Plaintiff's Privilege Log.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; violates best evidence rule; incorrect representation; not instructive.
135	N/A	Affidavit of Irene Raskin.	Description too vague to identify the proposed exhibit and the exhibit has not been provided. Defendants reserve their right to object once identified.
136	N/A	<i>Prakhin v. Fulton Towers Realty Corp.</i> , 990 N.Y.S.2d 439 (Sup. Ct. Kings Cty. 2014).	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; improper character evidence; incorrect representation; not instructive.
137	N/A	<i>Bianco v. Law Offices of Yuriy Prakhin, et al.</i> , No. 514493/2016 (Sup. Ct. Kings Cty.) Summons and Complaint.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; improper character evidence; incorrect representation; not instructive.

Exhibit No.	Bates No.	Description	Objection(s) by Defendants
138	N/A	<i>Bianco v. Law Offices of Yuriy Prakhin, et al.</i> , No. 514493/2016 (Sup. Ct. Kings Cty.) deposition transcript.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; improper character evidence; incorrect representation; not instructive. Description too vague to identify the proposed exhibit and the exhibit has not been provided. Defendants reserve their right to object once identified.
139	N/A	<i>Grinberg v. Law Office of Yuriy Prakhin, P.C., et al.</i> , No. 1:16-cv-03514-SJ-CLP (E.D.N.Y.) Complaint.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; improper character evidence; incorrect representation; not instructive.
140	N/A	<i>Law Office of Yuriy Prakhin, P.C. v. Grinberg</i> , No. No. 516842/2016 (Sup. Ct. Kings Cty.) Summons and Complaint.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; improper character evidence; incorrect representation; not instructive.
141	N/A	<i>Prakhin, et al. v. JPMorgan Chase Bank, NA</i> , No. 523354/2019 (Sup. Ct. Kings Cty.) Summons and Complaint.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003; improper character evidence; incorrect representation; not instructive.
142	N/A	Testimonials page from Firm website.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003 Description too vague to identify the proposed exhibit and the exhibit has not been provided. Defendants reserve their right to object once identified.
143	N/A	NYSBA Ethics Opinion No. 855.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003
144	N/A	NYCBA Formal Opinion No. 2003-02.	Relevance; Fed. Rules Evid. 403-404, 802-805, 901-902, 1003

B. Defendants' Exhibits

Defendants' Exhibit No.	Description	Objection(s) by Plaintiff
1	Demand Letter, dated March 4, 2019	Relevance; Fed. R. Evid. 403; Fed. R. Evid. 408; Hearsay; Foundation
2	Plaintiff's EEOC Charge, filed on March 20, 2019 (PLAINTIFF 000077-82)	N/A
3	Plaintiff's Right to Sue Letter, dated April 24, 2019	N/A
4	Plaintiff's Complaint filed on May 20, 2019 (ECF No. 1)	N/A
5	Defendants' Answer filed on July 15, 2019 (ECF No. 9)	N/A
6	The Firm's Employee Handbook signed by Plaintiff (D11911-D11941)	Relevance; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
7	The Firm's Employee Handbook, updated version.	Relevance; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
8	Instant Messages regarding the Firm's Cell Phone Policy, dated June 29, 2018 (D01951)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Incomplete Exhibit; Fed. R. Evid. 403
9	Email from Sandra Beron regarding SAGA notes, dated September 11, 2018 (D07450)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
10	Email from Irene Gabo regarding SAGA instructions (D10015)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
11	Plaintiff's Resume (PLAINTIFF 000075-76, 1538-1539)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
12	Subpoena Response from Mallilo & Grossman regarding Plaintiff's Employment (D014867)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Character Evidence; Fed. R. Evid. 403
13	Plaintiff's Time Sheet from June 1, 2018 - December 31, 2019	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403

14	Plaintiff's Hours Summary Report from June 1, 2018 - December 31, 2019	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
15	Plaintiff's Payroll Records from June-December 2018 (D13052-D13057)	Foundation; Lack of Personal Knowledge; Lack of Authentication
16	Record of Plaintiff's Settlements (D11942)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
17	Record of Plaintiff's Transportation Reimbursement Requests and Reimbursement Check	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
18	Documents showing cases assigned to Plaintiff from June-December 2018 (D00613-614, D01961, D01985-987, D02072-D02081, D03584, D03747, D03761, D03776-D03777, D03792, D03920, D04056, D04144, D04678, D05761, D05763-D05764, D07426, D07455-D07456, D07465-D07466, D07476, D07525-D07526, D07531, D07539, D07551, D07586-D07587, D07599-D07600, D07633, D07761, D07838-D07840, D08333-D08334, D08663, D08830, D08863, D08932, D09484, D09537, D10053-D10056, D10079, D10082, D10286, D10399, D10455-D10456, D11102, D11021, D11500, D11515, and D11956-D11963)	Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
19	Internal Message from Irene Gabo, dated July 17, 2017 (D01953)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
20	Emails regarding settlement of Plaintiff's assigned cases (D03613, D03802, D04281, D04589, D04667-D04670, D04675, D04678, D05721, D05729, D05825, D07345, D07455-D07456, D07539, D07652-D07653, D07585, D07901, D08331-D08332, D08460-D08469, D08589-D08590, D08620-D08621, D08850, D09339-340, D09358, D09479-D09481, D09528, D09531-D09533, D09537, D10090, D10288, D10292-D10293, and D10642-D10643)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Incomplete Exhibit; Fed. R. Evid. 403
21	Documents showing that paralegals drafted motions for Plaintiff (D01987, D10635, D06379-D06389)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions;

		Incomplete Exhibit; Fed. R. Evid. 403
22	Emails showing Plaintiff's failure to respond or perform work on assigned cases (D00557, D00684, D00817-D00818, D01794, D02035, D03560-D0361, D03615, D03621, D03803-D03805, D03811, D03867-D0368, D05320-D05321, D05400, D05682, D05714, D05724, D07353, D08167, D08265, D08830, D08847, D08850, D08962-D08963, D08968-D08969, D09715, D09572-D09573, D09576-D09580, D11166, and D11549-D11553)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Incomplete Exhibit; Fed. R. Evid. 403
23	Documents showing that other attorneys and employees at the Firm performed work on cases assigned to Plaintiff (D01794, D01811, D01815, D03544, D03576, D03763, D04998-D04999, D05324-D05349, D05469, D05492, D06296, D07364, D07856-D07877, D08531, D09436, D10244, D10631-D10632, and D10968)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Incomplete Exhibit; Fed. R. Evid. 403
24	Documents showing Plaintiff's failure to enter SAGA notes (D00028, D01874-D01878, D01885-D01893, D01898-D01900, D01903-D01905, D01908-D01910, D01917, D01922-D01924, D01927-D01938, D01942-D01944, D02015-D02016, and D05679)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Incomplete Exhibit; Fed. R. Evid. 403
25	Emails showing that paralegals engaged in communications with the Firm's clients that were assigned to Plaintiff (D03746, D03617, D03620, D03729, D03772, D04100, D08850, D08966-D08967, and D09661)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Incomplete Exhibit; Fed. R. Evid. 403
26	Plaintiff's paralegal engaged in settlement negotiations for Plaintiff's cases (D03799)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Incomplete Exhibit; Fed. R. Evid. 403
27	Plaintiff's personal emails using the Firm-provided email account (D00546, D11269-273, D11307, D11419-420, D11423, D11431-D11432, and D11479-D11480)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
28	Emails showing Plaintiff's parking tickets (D07878-D07883, D08487-D08504)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack

		of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
29	Confidential Documents from the Firm retained by Plaintiff (PLAINTIFF 000576-652)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
30	Documents regarding the Firm's clients and cases retained by Plaintiff (PLAINTIFF 000083-87, 115-117, 121-126, 129-130, 136, 151-153, 156-157, 162-166, 168-169, 180-197, 209-211, 315-349, 352, 372-411, 426-470, 491-519, 540, 546-547, 549-551, 559-679, 681, 684-700, 702-703, 715-720, 1059-1093)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Incomplete Exhibit; Fed. R. Evid. 403
31	SAGA Notes entered by Plaintiff from June-December 2018 (D11582-D11595)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
32	SAGA Notes entered by Irene Gabo from June-December 2018 (D11622-D11707, D13289-D14079)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
33	SAGA Notes entered by Sandra Beron from June-December 2018 (D11790-D11827, D14386-D14534)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
34	SAGA Notes entered by Lilit Avetisyan from June-December 2018 (D11708-D11769, D14080-D14385)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
35	SAGA Notes entered by Anna Broxmeyer from June-December 2018 (D14534-D14671)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
36	SAGA Notes entered by Gregory Nahas from June-December 2018 (D11596-D11621, D14672-D14764)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
37	SAGA Notes entered by Nicholas Serlin from June-December 2018 (D11770-D11789, D14765-D14848)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403

38	SAGA Notes entered by Stephen Revis from June-December 2018 (D11828-D11831, D14849-D14866)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
39	Payroll Records of Sandra Beron from June-December 2018 (D13109-D13118)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
40	Payroll Records of Irene Gabo from June-December 2018 (D13100-D13107)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
41	Payroll Records of Gil Zohar from January-July 2019 (D13119-D13128)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
42	Summary Hours Reports from June 18, 2018-December 14, 2018 for other attorneys and paralegals assigned to Plaintiff (D11832-D11838)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
43	Time Sheets from June 18, 2018-December 14, 2018 for other attorneys and paralegals assigned to Plaintiff (D11839-D11888)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
44	Summary Hours Report from January 1, 2019 - December 31, 2019 for Gil Zohar (D11889-D11890)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
45	Time Sheets from January 1, 2019 - December 31, 2019 for Gil Zohar (D11891-D11902)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
46	Affidavit of Natalia Generalova, sworn to on May 6, 2021	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
47	Affidavit of Azfar Khan, sworn to on May 7, 2021	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack

		of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
48	Affidavit of Vitaliy Lyutyk, sworn to on May 6, 2021	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
49	Affidavit of Laura Shvarts, sworn to on May 6, 2021	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
50	Audio Recording No. 384	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
51	Certified Transcript of Audio Recording No. 384	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
52	Audio Recording No. 386	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
53	Certified Transcript of Audio Recording No. 386	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403

54	Audio Recording No. 419	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
55	Certified Transcript of Audio Recording No. 419	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
56	Audio Recording No. 482	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
57	Certified Transcript of Audio Recording No. 482	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
58	Audio Recording No. 484	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
59	Certified Transcript of Audio Recording No. 484	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
60	Audio Recording No. 538	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper

		Character Evidence; Fed. R. Evid. 403
61	Certified Transcript of Audio Recording No. 538	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
62	Audio Recording No. 571	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
63	Certified Transcript of Audio Recording No. 571	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
64	Audio Recording No. 597	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
65	Certified Transcript of Audio Recording No. 597	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
66	Audio Recording No. 656	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
67	Certified Transcript of Audio Recording No. 656	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack

		of Authentication; Improper Opinions and Conclusions; Improper Character Evidence; Fed. R. Evid. 403
68	Deposition Transcripts showing Plaintiff's Appearances from June-December 2018 (D01870-D01871, D01874-D01875, D01877-D01880, D01882-D01883, D01885-D01886, D1888-D01889, D01891-D01892, D01894-D01899, D01901-D01904, D01906-D01909, D01911-D01916, D01918-D01923, D01925-D01928, D01930-D01931, D01933-D01934, D01936-D01937, D01939-D01940, D01942-D01943, D01945-D01946)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
69	The Firm's calendar documents from September 26, 2018 (D012415-D012419)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
70	The Firm's calendar documents from September 27, 2018 (D012407-D012414)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
71	The Firm's calendar documents from October 4, 2018 (D012721-D012724)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
72	The Firm's calendar documents from October 5, 2018 (D012716-D012720)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
73	The Firm's calendar documents from October 8, 2018 (D012712-D012715)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
74	The Firm's calendar documents from October 9, 2018 (D012704-D012711)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
75	The Firm's calendar documents from October 10, 2018 (D012698-D012702)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403

76	The Firm's calendar documents from October 11, 2018 (D012693-D012697)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
77	The Firm's calendar documents from October 12, 2018 (D012686-D012692)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
78	The Firm's calendar documents from October 15, 2018 (D012675-D012685)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
79	The Firm's calendar documents from October 16, 2018 (D012667-D012674)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
80	The Firm's calendar documents from October 18, 2018 (D012651-D012657)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
81	The Firm's calendar documents from October 19, 2018 (D012644-D012650)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
82	The Firm's calendar documents from November 5, 2018 (D012909-D012914)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
83	The Firm's calendar documents from November 9, 2018 (D012869-D012877)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
84	The Firm's calendar documents from November 15, 2018 (D012832-D012839)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
85	The Firm's calendar documents from November 16, 2018 (D012826-D012831)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403

86	The Firm's calendar documents from November 19, 2018 (D012816-D012825)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
87	The Firm's calendar documents from November 20, 2018 (D012806-D012815)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
88	The Firm's calendar documents from November 21, 2018 (D012799-D012805)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
89	The Firm's calendar documents from November 26, 2018 (D012792-D012798)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
90	The Firm's calendar documents from November 27, 2018 (D012780-D012791)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
91	The Firm's calendar documents from November 30, 2018 (D012751-D012757)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
92	The Firm's calendar documents showing Plaintiff's appearances at depositions from June-December 2018 (D012003, D012008, D011993, D012001, D012207, D012213, D012192, D012203, D012185, D012139, D12140, D12107, D012115, D12130, D012133, D012390, D012396, D012380, D012384, D012366, D012371, D012357, D012336, D012340, D012295, D012300, D012253, D012256, D012244, D012247, D012532, D012539, D012499, D012477, D012481, D012442, D012447, D012424, D012658, D012666, D012635, D012642, D012602, D012606, D012921, D012929, D012896, D012899, D012863, D012865, D012758, D012767, D013039, D013044, D013023, D012984, D012989)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
93	Email from Plaintiff regarding return to work, dated October 15, 2018 (D01679, PLAINTIFF 000675)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack

		of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
94	Email regarding Plaintiff's work while absent (D01619)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Incomplete Exhibit; Fed. R. Evid. 403
95	Documents showing Gil Zohar's employment with the Firm in August and September 2018 (D10027, D012667, D012716-718, D012780-783, D012807)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Incomplete Exhibit; Fed. R. Evid. 403
96	Email confirming termination date of Gregory Nahas (D01866-D01867)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Opinions and Conclusions; Incomplete Exhibit; Fed. R. Evid. 403
97	The Firm's ZipRecruiter Invoices (D13129-D13134)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
98	Plaintiff's Certification, dated May 18, 2020	Relevance; Hearsay; Foundation; Incomplete Exhibit; Fed. R. Evid. 403
99	Internal Message from Erica Larssen to Plaintiff regarding JAWS, dated November 28, 2018 (D01982, D02070-D02071)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
100	Invoices from IT Plus Solutions (D11949-D11952)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
101	Defendants' First Set of Interrogatories, dated November 5, 2019	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403

102	Plaintiff's Responses to Defendants' First Set of Interrogatories, dated January 10, 2020	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
103	Defendants' First Request for the Production of Documents, dated November 5, 2019	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
104	Plaintiff's Responses to Defendants' First Request for the Production of Documents, dated January 10, 2020	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
105	Defendants' Second Request for the Production of Documents, dated August 3, 2020	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
106	Plaintiff's Responses to Defendants' Second Request for the Production of Documents, dated September 23, 2020	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
107	Defendants' Third Request for the Production of Documents, dated December 1, 2020	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
108	Plaintiff's Responses to Defendants' Third Request for the Production of Documents, dated January 8, 2021	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
109	Defendants' Fourth Request for the Production of Documents, dated December 29, 2020	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
110	Plaintiff's Responses to Defendants' Fourth Request for the Production of Documents, dated January 29, 2021	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
112	Subpoena on T-Mobile and Response	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
113	Declaration of Innessa M. Huot, dated March 8, 2021	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
114	Declaration of Yelena Ruderman, dated July 6, 2021	Foundation; Lack of Authentication; Fed. R. Evid. 403
115	Plaintiff's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment (ECF No. 90)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403

116	Plaintiff's Invoices (PLAINTIFF 1-14, 723-761, 1094-1095, 1260-1297, 1306-1307, 1490, 1494, 1499, 1507, 1510, 1515, 1523, 1525, 1536, 1541, 1547, 1550, 1551, 1580, 1594, 1599, 1611, 1619, 1623, 1627, 1632, 1644, 1649, 1665, 1674-1736, 1743, 1746-1747, 1749-1750, 1753-1756, 1759-1761, 1768-1769, 1776, 1779, 1783, 1786-1787, 1794-1795, 1831, 1834, 1847, 1849-1852, 1857, 1866-1867, 1870-1871, 1873, 1876, 1879, 1881, 1891-1892, 1901, 1903-1904, 1917)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
117	Plaintiff's Forms 1099-Misc and Form 1099-NEC (PLAINTIFF 1048-1052, 1300-1301, 1303-1305, 1796, 1878; D11944)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
118	2019 Payment for Referral (PLAINTIFF 721-722; D11943-D11944)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
119	Summary Chart of Plaintiff's Earnings since her 2018 employment with the Firm	Hearsay; Foundation; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403; Best Evidence Rule; Incorrect Representation; Not Instructed. Plaintiff has not been provided this exhibit. As such, Plaintiff reserves all rights, including, without limitation, the right to assert further objections after review of the exhibit.
120	Medical Records from Dr. Anna Shostak (PLAINTIFF 000033-42)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
121	Medical Records from NYU Langone Eye Center (D014891, D014899, D014905, D014915, D014917, D014924)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
122	Medical Records from Dr. Julia Giyaur (D014882)	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack

		of Authentication; Incomplete Exhibit; Fed. R. Evid. 403
123	Affidavit of Nicole E. Price, dated May 11, 2021 regarding chain of custody of audio recordings	Relevance; Hearsay; Foundation; Lack of Personal Knowledge; Lack of Authentication; Fed. R. Evid. 403
124	Email exchange between Plaintiff and Irene Gabo, dated August 2, 2018 (D10784)	Relevance; Foundation; Lack of Personal Knowledge; Lack of Authentication; Improper Character Evidence; Fed. R. Evid. 403
125	American Bar Association, Formal Opinion 489 (2019)	Relevance; Foundation; Lack of Authentication; Fed. R. Evid. 403
126	NYSBA NY Rules of Professional Conduct (2021)	Relevance; Foundation; Lack of Authentication; Fed. R. Evid. 403
127	Summary Chart of Plaintiff's absences, medical appointments, and appearances at court/depositions during her 2018 employment with the Firm	Hearsay; Foundation; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403; Best Evidence Rule; Incorrect Representation; Not Instructed. Plaintiff has not been provided this exhibit. As such, Plaintiff reserves all rights, including, without limitation, the right to assert further objections after review of the exhibit.
N/A	Enlarged versions of the exhibits of any Party.	Relevance; Hearsay; Foundation; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403; Best Evidence Rule; Incorrect Representation; Not Instructed. Plaintiff has not been provided this exhibit. As such, Plaintiff reserves all rights, including, without limitation, the right to assert further objections after review of the exhibit.
N/A	Enlarged excerpts of the deposition or trial testimony of any witness.	Relevance; Hearsay; Foundation; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403; Best

		<p>Evidence Rule; Incorrect Representation; Not Instructed.</p> <p>Plaintiff has not been provided this exhibit. As such, Plaintiff reserves all rights, including, without limitation, the right to assert further objections after review of the exhibit.</p>
N/A	Electronic highlighting and/or cropping and/or “pop-outs” of the exhibits of any Party.	<p>Relevance; Hearsay; Foundation; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403; Best Evidence Rule; Incorrect Representation; Not Instructed.</p> <p>Plaintiff has not been provided this exhibit. As such, Plaintiff reserves all rights, including, without limitation, the right to assert further objections after review of the exhibit.</p>
N/A	Electronic highlighting and/or cropping and/or “pop-outs” of the deposition or trial testimony of any witness.	<p>Relevance; Hearsay; Foundation; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403; Best Evidence Rule; Incorrect Representation; Not Instructed.</p> <p>Plaintiff has not been provided this exhibit. As such, Plaintiff reserves all rights, including, without limitation, the right to assert further objections after review of the exhibit.</p>
N/A	Compilations of information contained within the exhibits of any party, including, but not limited to, lists, charts, graphs, tables, timelines, PowerPoint presentations, slide shows or any other form of presenting such information.	<p>Relevance; Hearsay; Foundation; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403; Best Evidence Rule; Incorrect Representation; Not Instructed.</p>

		Plaintiff has not been provided this exhibit. As such, Plaintiff reserves all rights, including, without limitation, the right to assert further objections after review of the exhibit.
N/A	Compilations of the deposition or trial testimony of any witness, including, but not limited to, lists, charts, graphs, tables, timelines, PowerPoint presentations, slideshows or any other form of presenting such information.	Relevance; Hearsay; Foundation; Lack of Authentication; Incomplete Exhibit; Fed. R. Evid. 403; Best Evidence Rule; Incorrect Representation; Not Instructed. Plaintiff has not been provided this exhibit. As such, Plaintiff reserves all rights, including, without limitation, the right to assert further objections after review of the exhibit.

*** *Remainder of page intentionally left blank. Signatures on following page. ****

Dated: May 27, 2022
New York, New York

FARUQI & FARUQI, LLP

/s/ Innessa M. Huot
Innessa M. Huot
Alex J. Hartzband
Camilo M. Burr

685 Third Avenue, 26th Floor
New York, NY 10017
Tel: (212) 983-9330
Fax: (212) 983-9331
[ihuot@faruqilaw.com](mailto:i.huot@faruqilaw.com)
[ahartzband@faruqilaw.com](mailto:a.hartzband@faruqilaw.com)
[cburr@faruqilaw.com](mailto:c.burr@faruqilaw.com)

Attorneys for Plaintiffs

BOND SCHOENECK & KING, PLLC

/s/ Mary Ellen Donnelly
Mary Ellen Donnelly
Louis DiLorenzo
Nicole E. Price

600 Third Avenue, 22nd Floor
New York, New York 10016
Tel: 646-253-2300
Fax: 646-253-2301
m.donnelly@bsk.com
dilorel@bsk.com
n.price@bsk.com

Attorneys for Defendants

Service of a copy of this Order shall be made by the Clerk of the Court by forwarding a copy hereof to all parties.

SO ORDERED:

RAYMOND J. DEARIE
United States District Court Judge

DATED: _____
Brooklyn, New York